

WIGDOR.

David E. Gottlieb

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January 23, 2025

VIA ECF

The Honorable Ronnie Abrams
United States District Judge
Southern District of New York
Thurgood Marshall Courthouse
40 Foley Square, Room 1506
New York, NY 10007

Application granted. In light of the extensions to the parties' deadlines to respond to the complaints, the initial pretrial conference is hereby adjourned to February 28, 2025 at 2:30 p.m. The parties' joint letter and proposed case management plan shall be filed no later than February 21, 2025.

SO ORDERED.



Hon. Ronnie Abrams

January 24, 2025

Re: *Gangl v. Fractional Ownership Holdings, LLC et al.*, No. 1:24-cv-09371-RA
ex. rel. *Fractional Ownership Holdings, LLC v. Gangl*, No. 24-cv-9036

Dear Judge Abrams,

We represent Defendant/Counter-Plaintiff Jeffrey Gangl ("Mr. Gangl") and write jointly with Plaintiff/Counter-Defendants Fractional Ownership Holdings LLC ("Fractional") and Philip Newman ("Mr. Newman") to respectfully request the following brief extensions on mutual consent:

- The Court is holding an initial conference on Friday, January 31, 2025, and the parties' joint letter and proposed case management plan is due for submission on Friday, January 24, 2025. The parties respectfully request an extension until Monday, January 27, 2025 for those submissions. Mr. Gangl's counsel is currently busy representing a domestic violence victim in a criminal trial and Fractional and Mr. Newman's counsel is traveling abroad, creating difficulty in collaborating on the joint submissions. This is the first request for an extension of this deadline.
- Mr. Gangl's response to Fractional's complaint is currently due Monday, January 27, 2025. Mr. Gangl respectfully requests an extension until February 12, 2025. The reason for the request includes the reasons set forth above, in addition to the fact that initial lead counsel in this matter recently went on maternity leave. Fractional and Mr. Newman have consented to this request. Reciprocally, we have consented to an identical extension for Fractional and Mr. Newman to respond to Mr. Gangl's complaint from February 7, 2025 to February 24, 2025. This is the first request for an extension of these deadlines.



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We thank the Court for Your Honor's attention to these matters and look forward to the initial conference on January 31, 2025.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "D. E. Gottlieb", is written over a light blue circular stamp.

David E. Gottlieb